

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket Nos. 360, 651, 657, 941 & 1014

**NOTICE OF FILING OF REVISED PROPOSED ORDER (I) CONFIRMING THIRD  
MODIFIED FIRST AMENDED JOINT CHAPTER 11 PLAN OF LORDSTOWN  
MOTORS CORP. AND ITS AFFILIATED DEBTORS AND  
(II) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that, on September 1, 2023, the above-captioned debtors and debtors-in-possession (the “**Debtors**”) filed the *Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 360] (the “**Plan**”) with the with the United States Bankruptcy Court for the District of Delaware Court (the “**Bankruptcy Court**”).

**PLEASE TAKE FURTHER NOTICE** that, on November 1, 2023, the Bankruptcy Court entered the *Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with the Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief* [Docket No. 651].

**PLEASE TAKE FURTHER NOTICE** that, on November 1, 2023, the Debtors filed the *Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* (as amended or modified in accordance with its terms) [Docket No. 657].

---

<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

**PLEASE TAKE FURTHER NOTICE** that, on January 31, 2024, the Debtors filed the *Second Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 941].

**PLEASE TAKE FURTHER NOTICE** that, on February 27, 2024, the Debtors filed the *Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 1014].

**PLEASE TAKE FURTHER NOTICE** that, on December 1, 2023, the Debtors filed the *Notice of Filing of Proposed Order (I) Confirming Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors and (II) Granting Related Relief* [Docket No. 767] (the “**Proposed Confirmation Order**”)

**PLEASE TAKE FURTHER NOTICE** that, contemporaneously herewith, the Debtors have filed the *Order (I) Confirming Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors and (II) Granting Related Relief* (the “**Revised Proposed Confirmation Order**”), attached hereto as **Exhibit A**

**PLEASE TAKE FURTHER NOTICE** that the Debtors intend to present the Revised Proposed Confirmation Order to the Bankruptcy Court for approval at the hearing scheduled for **March 5, 2024, at 3:00 p.m. (prevailing Eastern Time)** before the Honorable Mary F. Walrath (the “**Confirmation Hearing**”).

**PLEASE TAKE FURTHER NOTICE** that for the convenience of the Court and all parties in interest, a blackline of the Revised Proposed Confirmation Order against the Proposed Confirmation Order is attached hereto as **Exhibit B**.

**PLEASE TAKE FURTHER NOTICE** that the Debtors reserve the right to amend, revise, modify or supplement the Revised Proposed Confirmation Order prior to, at, or as a result of, the Confirmation Hearing.

Dated: February 27, 2024  
Wilmington, Delaware

/s/ Morgan L. Patterson

**WOMBLE BOND DICKINSON (US) LLP**  
Donald J. Detweiler (DE Bar No. 3087)  
Morgan L. Patterson (DE Bar No. 5388)  
1313 North Market Street, Suite 1200  
Wilmington, Delaware 19801  
Telephone: (302) 252-4320  
Facsimile: (302) 252-4330  
[don.detweiler@wbd-us.com](mailto:don.detweiler@wbd-us.com)  
[morgan.patterson@wbd-us.com](mailto:morgan.patterson@wbd-us.com)

*Counsel to the Debtors and Debtors in Possession*

**WHITE & CASE LLP**

Thomas E Lauria (admitted *pro hac vice*)  
Matthew C. Brown (admitted *pro hac vice*)  
Fan B. He (admitted *pro hac vice*)  
200 South Biscayne Boulevard, Suite 4900  
Miami, FL 33131  
Telephone: (305) 371-2700  
[tlauria@whitecase.com](mailto:tlauria@whitecase.com)  
[mbrown@whitecase.com](mailto:mbrown@whitecase.com)  
[fhe@whitecase.com](mailto:fhe@whitecase.com)

David M. Turetsky (admitted *pro hac vice*)  
1221 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 819-8200  
[david.turetsky@whitecase.com](mailto:david.turetsky@whitecase.com)

Jason N. Zakia (admitted *pro hac vice*)  
111 South Wacker Drive, Suite 5100  
Chicago, IL 60606  
Telephone: (312) 881-5400  
[jzakia@whitecase.com](mailto:jzakia@whitecase.com)

Roberto Kampfner (admitted *pro hac vice*)  
Doah Kim (admitted *pro hac vice*)  
RJ Szuba (admitted *pro hac vice*)  
555 South Flower Street, Suite 2700  
Los Angeles, CA 90071  
Telephone: (213) 620-7700  
[rkampfner@whitecase.com](mailto:rkampfner@whitecase.com)  
[doah.kim@whitecase.com](mailto:doah.kim@whitecase.com)  
[rj.szuba@whitecase.com](mailto:rj.szuba@whitecase.com)

*Counsel to Debtors and  
Debtors in Possession*